

ORIGINAL

UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK

JUDGE ABRAMS

UNITED STATES OF AMERICA

INDICTMENT

v.

24 Cr.

MOSHE BERGER,

24 CRIM 172

Defendant.

COUNT ONE
(Interstate Extortion Threat)

The Grand Jury charges:

1. On or about December 6, 2023, in the Southern District of New York and elsewhere, MOSHE BERGER, the defendant, knowingly and with intent to extort money and things of value from a person, transmitted in interstate and foreign commerce communications containing threats to kidnap and injure a person, to wit, BERGER communicated by telephone from the State of New York to the State of New Jersey a threat to kill a particular individual ("Victim-1") if Victim-1 did not come to BERGER with money immediately.

(Title 18, United States Code, Section 875(b).)

FORFEITURE ALLEGATION

2. As a result of committing the offense alleged in Count One of this Indictment, MOSHE BERGER, the defendant, shall forfeit to the United States, pursuant to Title 18, United States Code, Section 981(a)(1)(C), and Title 28, United States Code, Section 2461(c), any and all property, real and personal, that constitutes or is derived from proceeds traceable to the commission of said offense, including but not limited to a sum of money in United States currency representing the amount of proceeds traceable to the commission of said offense.

Substitute Assets Provision

3. If any of the above-described forfeitable property, as a result of any act or omission of the defendant:

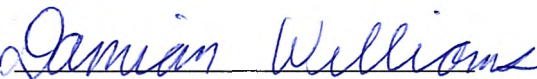
- a. cannot be located upon the exercise of due diligence;
- b. has been transferred or sold to, or deposited with, a third person;
- c. has been placed beyond the jurisdiction of the Court;
- d. has been substantially diminished in value; or
- e. has been commingled with other property which cannot be subdivided without difficulty;

it is the intent of the United States, pursuant to Title 21, United States Code, Section 853(p) and Title 28, United States Code, Section 2461(c), to seek forfeiture of any other property of the defendant up to the value of the above forfeitable property.

(Title 18, United States Code, Section 981;
Title 21, United States Code, Section 853; and
Title 28, United States Code, Section 2461.)



FOREPERSON



DAMIAN WILLIAMS
United States Attorney